

EXHIBIT A

Supplemental Declaration of Ismael Castillo Gutierrez

I, Ismael Castillo Gutierrez, declare as follows:

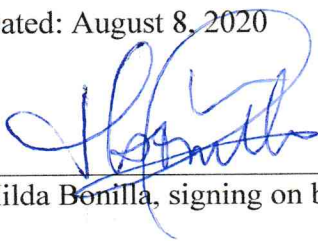
1. I am one of the Plaintiffs in this case. I have previously submitted a declaration in this case and submit this supplemental declaration to provide additional information to the Court.
2. Since my first declaration in this case, there are roughly the same number of people in my dorm. I think two people have been deported, but there has not been a large reduction. There are between 30 and 40 people in my dorm. Social distancing still remains impossible. I have not seen any social distancing measures being taken.
3. I was tested for COVID-19 a second time about two weeks ago. I have not received test results as of the writing of this declaration. Some of the people in my dorm heard staff say that everyone in my dorm has tested positive again.
4. I am still experiencing COVID-19 symptoms. On August 4, I had diarrhea, nausea, and headaches. On the night of August 5, I had chest pain, issues breathing, and felt suffocation. I was so afraid of falling asleep that night because I felt like I was going to asphyxiate. I did not ask for help because the requests take too long and they always give people acetaminophen. I am still having trouble sleeping and body aches.
5. I have also lost my appetite. I only eat once a day, often it is food I buy from the commissary because I do not like the food they serve us, and I have not been able to regain any of the weight I have lost since I got sick.
6. On August 7, I went to the doctor at noon and received Pepto Bismol and acetaminophen. I told the doctor I wanted to gain weight, but all she did was give me these medications. The doctor told me I should let them know if the pain and diarrhea continue.
7. In the morning of August 8, I was again given Pepto Bismol and acetaminophen.
8. I am tired of asking for help at Farmville and not getting proper treatment. Many of my symptoms have been untreated. I know I won't be helped if I ask so why should I even bother?
9. There are other people in my dorm who have body aches, headaches, and chest pain. Some people get acetaminophen and others buy medicine at the commissary to ease some of their symptoms.
10. The only change in conditions since my first declaration is that we are now being provided Gatorade. That started about two weeks ago. The staff still checks our temperature every day. I hear other detainees question the staff about how they expect detainees to get better if they are not receiving proper treatment.
11. I was served expired milk last week. I asked them to change the milk and they did.

12. There are 4-5 people who tested positive for COVID-19 and are working in the kitchen. I don't know if they have been retested.
13. In my first declaration, I mentioned an incident on July 1 where Farmville guards used force and pepper spray against detainees in my dorm. As I mentioned in my declaration, the guards were the ones who started the violence. The pepper spray started coming out in a gush that did not stop. All the detainees wanted was to talk to someone from ICE about the terrible conditions in our dorm, ask about when we would be tested for COVID-19, and when we would be provided with medications because many people were already showing symptoms. Some people were trying to get away from the pepper spray and jumped over a wall that was close to the bathrooms. Others were chained and taken away as the pepper spray burned their faces and they were asking for help. The people who the guards said were violent were crying for help.
14. On August 8, 2020, I found out that a Canadian man who was in my dorm died. He was an older man of about 70 to 75 years old. He was part of the group of people who talked to the officers during the July 1 protest. The day after we were sprayed with pepper spray, he was taken to the hospital. He did not seem too well. He returned about three days later but then he was taken out of the dorm again.
15. The guards sprayed so much pepper spray and it was so intense that, to this day, there is still residue from it in the dorm. For example, if you touch a chair and then touch your face, you can feel the burn from the pepper spray on your skin. When detainees mop the floor, people start sneezing and coughing because we still feel the pepper spray.
16. My immigration case is still pending. I have a hearing before an immigration judge on August 14, 2020.

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge.

Ismael Castillo Gutierrez gave me authority to say that this is true and correct and to sign on his behalf because he is currently detained and, due to the COVID-19 pandemic, I am not able to visit him in person to obtain his signature. I spoke to Mr. Ismael Castillo Gutierrez by phone on August 7, 2020, wrote down what he said and wrote the declaration based on what he said. On August 8, 2020, I read the above declaration back to Mr. Ismael Castillo Gutierrez word for word to confirm its accuracy and Mr. Ismael Castillo Gutierrez stated that it was accurate.

Dated: August 8, 2020



Hilda Bonilla, signing on behalf of Mr. Ismael Castillo Gutierrez